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IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF ALEXANDER
SWANSON IN SUPPORT OF
FACEBOOK'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
SPECIAL MASTER'S ORDER**

I, Alexander Swanson, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of California. I submit this declaration in support of Facebook’s Administrative Motion to Seal. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit A** is a true and correct **redacted** version of Special Master Garrie’s October 21, 2021 Order Regarding Motion To Compel Mark Zuckerberg And Sheryl Sandberg As Document Custodians (the “Order”).

3. Attached as **Exhibit B** is a true and correct **unredacted** version of the Order.

4. The Order and supporting exhibits contain numerous quotations from and descriptions of documents Facebook designated Confidential or Highly Confidential—Attorneys’ Eyes Only under the Protective Order in this case. Dkt. 122.

5. I am informed and believe that these quotations and descriptions reveal Facebook’s confidential business information, strategies, relationships, and financial information, and if publicly disclosed, Facebook’s competitors could take advantage of this commercially sensitive information to cause Facebook competitive harm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 12, 2021 in South Pasadena, California.



Alexander Swanson